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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 UNITED STATES OF AMERICA,) Case No.15-CR-00212-JST
18 Plaintiff,)
19 v.) STIPULATION AND [PROPOSED] ORDER
20 JOSE VLADAMIR ORTIZ,) CONTINUING SENTENCING FROM
21 Defendant.) NOVEMBER 6, 2015 To JANUARY 8, 2016

STIPULATION

2 Defendant Jose Ortiz (hereafter, the “Defendant”) is presently set for sentencing in the above-
3 referenced matter on November 6, 2015. Defense counsel has raised a number of objections to the
4 Presentence Report prepared by U.S. Probation Officer Charlie Mabie. The Government provided new
5 discovery to defense counsel in hopes of resolving the objections. At present, Defendant is unwilling to
6 withdraw the objections. As such, the sentencing in this matter will be less straightforward and the
7 parties request additional time to prepare sentencing memorandums. To allow time to do so, the parties
8 respectfully ask the Court to reschedule the matter to January 8, 2016. The parties have also alerted
9 U.S. Probation Officer Mabie to their requested continuance. Based on the good cause described above,
10 the parties make their request to allow for effective preparation of counsel and in the interests of justice.

IT IS SO STIPULATED.

12 | DATED: November 4, 2015

/s/

/s/
JOYCE LEAVITT
Counsel for Jose Ortiz

1 **[PROPOSED] ORDER**

2 For the reasons stated by the parties, the Court finds that the aforementioned request is supported
3 by good cause and hereby reschedules the sentencing of defendant Jose Vladamir Ortiz from November
4 6, 2015 to January 8, 2016.

5 IT IS SO ORDERED.

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7 Dated: November 4, 2015

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9 HONORABLE JON S. TIGAR
United States District Judge